

ALEXANDER J. HADJIS (pro hac vice)  
Alexander.Hadjis@cwt.com  
CADWALADER, WICKERSHAM & TAFT LLP  
700 Sixth Street, N.W.  
Washington, D.C. 20001  
Telephone: (202) 862-2323  
Facsimile: (202) 862-2400

RUDY Y. KIM (CA SBN 199426)  
RudyKim@mofo.com  
ALAN COPE JOHNSTON (CA SBN 66334)  
ACJohnston@mofo.com  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304  
Telephone: (650) 813-5600  
Facsimile: (650) 494-0792

JOSHUA A. HARTMAN (pro hac vice)  
JHartman@mofo.com  
MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
Suite 6000  
Washington, DC 20006  
Telephone: (202) 887-1500  
Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

MEDIATEK INC.,  
  
Plaintiff,  
  
v.  
  
FREESCALE SEMICONDUCTOR, INC.,  
  
Defendant.

Civil Action No. 4:11-cv-05341 (YGR)

**FREESCALE'S STIPULATED  
ADMINISTRATIVE MOTION TO  
SEAL FREESCALE CONFIDENTIAL  
INFORMATION IN MEDIATEK'S  
STIPULATED ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL, DOCKET NO. 323  
[REVISED DKT. NO. 323-15]**

Hon. Yvonne Gonzalez Rogers

1 In accordance with Civil Local Rules 7-11 and 79-5, and General Order No. 62,  
2 Defendant Freescale Semiconductor, Inc. (Freescale) submits this motion for an order to file  
3 under seal the confidential, unredacted versions of the following documents:

4 1. Portions of the revised Dkt. No. 323-15, Exhibit 3 to the Declaration of Brett  
5 Hammon in support of MediaTek's Opposition to Freescale's Motion to Exclude Testimony of  
6 Catharine M. Lawton (Exhibit 3 to the Hammon Declaration).

7  
8 MediaTek filed a Notice of Erratum in Exhibit Submitted In Support of MediaTek's  
9 Opposition to Freescale's Motion to Exclude Testimony of Catharine M. Lawton, Dkt. No. 375,  
10 and attached the revised Exhibit 3 to the Hammon Declaration in support of MediaTek's  
11 Opposition to Freescale's Motion to Exclude Testimony of Catharine M. Lawton (Exhibit 3 to the  
12 Hammon Declaration), Dkt. No. 323-15. The redacted portions of the revised Exhibit 3 to the  
13 Hammon Declaration discuss highly confidential information about third parties' end products  
14 incorporating Freescale accused products and how technology is implemented on those products,  
15 party-specific royalty rates, Freescale's sales revenues and projected profits, Freescale's practices  
16 with convoyed sales, and the application of proposed royalty rates to Freescale's revenues,  
17 derived from documents produced by Freescale and conversations disclosed in the Expert Report  
18 of Brett Reed, both of which had been designated "Highly Confidential – Attorneys' Eyes Only"  
19 pursuant to the Stipulated Protective Order, Docket No. 100, in force in this action.

20 Pursuant to Civil Local Rule 79-5(b), Freescale seeks to seal the identified portions of  
21 Exhibit 3 to the Hammon Declaration, Dkt. No. 323-15. Attached herewith is the Declaration of  
22 Mark Patrick, which provides the bases for sealing Exhibit 3 to the Hammon Declaration, Dkt.  
23 No. 323-15. Freescale also files a narrowly tailored proposed sealing order pursuant to Civil  
24 Local Rule 79-5(d)(1)(b).

25 Pursuant to Civil Local Rule 79-5(d)(2), Freescale will lodge with the Clerk the  
26 documents at issue, with accompanying chamber copies.

Pursuant to Civil Local Rule 7-11 and 7-12, Freescale and MediaTek stipulated to the filing of this Motion on December 23, 2013. A signed stipulation is attached. See Joint Stipulation to Freescale's Administrative Motion to Seal Freescale's Confidential Information.

For the foregoing reasons, Freescale requests that the Court enter the accompanying Proposed Order granting Freescale's Stipulated Administrative Motion to Seal Freescale's Confidential Information and designate the service copies of the revised Exhibit 3 to the Hammon Declaration, Dkt. No. 323-15, as "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY."

Dated: December 24, 2013

MORRISON & FOERSTER LLP

By: /s/ Michelle Yang

ALEXANDER J. HADJIS (pro hac vice)  
Alexander.Hadjis@cwt.com  
CADWALADER, WICKERSHAM & TAFT LLP  
700 Sixth Street, N.W.  
Washington, D.C. 20001  
Telephone: (202) 862-2323  
Facsimile: (202) 862-2400

RUDY Y. KIM (CA SBN 199426)  
RudyKim@mofo.com  
MORRISON & FOERSTER LLP  
755 Page Mill Road  
Palo Alto, California 94304  
Telephone: (650) 813-5600  
Facsimile: (650) 494-0792

JOSHUA A. HARTMAN (pro hac vice)  
JHartman@mofo.com  
MICHELLE YANG (pro hac vice)  
MYang@mofo.com  
MORRISON & FOERSTER LLP  
2000 Pennsylvania Avenue, NW  
Suite 6000  
Washington, DC 20006  
Telephone: (202) 887-1500  
Facsimile: (202) 887-0763

Attorneys for Defendant-Counterclaimant  
FREESCALE SEMICONDUCTOR, INC.